

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WALTER BECK CORPORATION d/b/a THE)
RAINBOW INN,)
)
)
Plaintiff,)
)
vs.) JUDGE MAURICE B. COHILL, JR.
)
)
SAFECO CORPORATION, AMERICAN)
ECONOMY INSURANCE COMPANY, and)
)
AMERICAN STATES INSURANCE)
COMPANY,)
)
)
Defendants.)

CIVIL DIVISION

Civil Action No. 04-348 - Erie

ELECTRONICALLY FILED

**JOINT STIPULATION TO EXTEND DEADLINE FOR FILING RESPONSES TO
MOTIONS FOR SUMMARY JUDGMENT AND AMEND CASE MANAGEMENT ORDER**

Plaintiff and Defendants, by their undersigned counsel, hereby stipulate to extend the deadline for filing responses to the parties' respective Motions for Summary Judgment and to amend the Case Management Order appropriately. In support thereof, Plaintiff and Defendants aver as follows:

1. This case involves a dispute regarding insurance coverage for Plaintiff's business, which was destroyed by a fire.

2. On August 28, 2006, upon motion of the Defendants, this Court amended its Case Management Order extending certain pretrial deadlines to the following: Discovery deadline of November 1, 2006; Motions filed no later than December 6, 2006; Responses to Motions due no later than December 27, 2006; If no Motions, Plaintiff's Pretrial Statement due no later than January 3, 2007. All other terms and conditions of the Case Management Order dated June 8, 2005, as periodically amended, remained in full force and effect. See Docket. No. 23.

3. On December 6, 2006, both Plaintiff and Defendants filed their respective Motions for Summary Judgment and accompanying briefs and supporting documentation. See Docket Nos. 24-31.

4. Under the present pretrial deadlines, both Plaintiff's and Defendants' responses to each other's Motion for Summary Judgment and accompanying briefs and supporting documentation are due on December 27, 2006.

5. In view of the holiday season and the parties' and their counsels' respective schedules, the parties and their counsel have agreed to extend the time for responding to each other's Motion for Summary Judgment and accompanying briefs and supporting documentation until February 2, 2007.

6. Thus, the parties request that this Court extend the time to file responses to their respective Motions for Summary Judgment until February 2, 2007 and to amend the Case Management Order accordingly as set forth in the accompanying proposed order.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court enter an Order in the form attached hereto.

Respectfully submitted and stipulated to:

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